



Minnesota Department of Natural Resources

500 Lafayette Road
St. Paul, Minnesota 55155-40__

March 30, 2004

Bill Storm, Project Manager
Minnesota Environmental Quality Board
658 Cedar Street
St. Paul, MN 55155



RE: Faribault Energy Park, LLC, Docket #02-48-PPS-FEP
Environmental Impact Statement

Dear Mr. Storm:

The Department of Natural Resources (DNR) has reviewed the Draft Environmental Impact Statement (EIS) the EQB prepared for the proposed Faribault Energy Park 250 megawatt electric generating facility.

Groundwater Appropriation

The Department remains concerned about the large water appropriation that will be required to operate the facility. The Executive Summary indicates 2 million gallons per day (GPD) will be extracted from the Jordan Formation; elsewhere in the Draft EIS, water usage is given as "approximately 1.9 million gallons per day." The DNR has repeatedly requested that the proposer meet with Area Hydrologist, Randy Bradt (507-333-2051), to begin the permit application process (in comments regarding the Environmental Report prepared during the Certificate of Need process, and in comments on EIS Scoping). Unfortunately, this contact has not yet occurred and we do not have enough information to assess the potential impacts of groundwater withdrawal.

Particularly lacking from the EIS is an indication of the monthly or annual appropriation. An appropriation of this size is significant and could easily approach the statutory threshold for requiring legislative approval (Minnesota Statutes §103G.265, subdivision 3 for consumptive use of more than 2 million GPD average in a 30-day period.) A pumping test with observation wells will be required before a permit can be issued. Again, we recommend the proposer initiate the permitting process as quickly as possible.

Wastewater

We encourage the proposer to investigate opportunities to use some of the project wastewater for enhancing wetlands on or near the site.

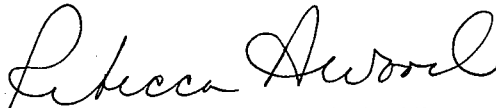
Sanitary waste

An on-site septic system is proposed. Since the project site has been annexed, we encourage use of the municipal sewer system if feasible.



Thank you for the opportunity to review this document. We look forward to receiving the Final EIS including responses to these comments. Please contact me with any questions regarding this letter.

Sincerely,



Rebecca A. Wooden, Technical Representative to EQB
Environmental Policy and Review Unit
Division of Ecological Services
(651)297-3355

c: Randy Bradt, DNR Waters, Faribault
Shannon Fisher, DNR Ecological Services, New Ulm
James Larson, Faribault Energy
Jeff Green, DNR Waters, Rochester
Dan Stinnett, USFWS

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